

Received & Inspected
JUN 15 2009
FCC Mail Room

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 9300 East Hampton Drive Capitol Heights, MD 20743 ATTN: MB Docket No. 09-68

June 11, 2009

Dear Madame Secretary:

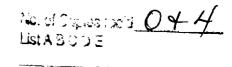
Please accept this submission in response to MB Docket No. 09-68, a request for comments related to the congressional directive to the FCC to issue a report regarding "commercial proposals for broadcasting radio or television programs for reception onboard specially-equipped school buses operated by, or under contract with, local public educational agencies."

I am writing today on behalf of BusRadio, a radio service which downloads via Wi-fi, age-appropriate music, original programming, and public service messages to more than 1 million listeners between the ages of 6 and 18 every weekday during their school bus ride. BusRadio reaches more than 8,500 buses in 170 school districts in 24 states.

BusRadio addresses the most important concerns of schools and parents: student safety and age-appropriate listening content for young people. In fact, safety is the number one reason that districts turn to BusRadio.

With our units on board, districts benefit from the features necessary to ensure that their school buses are as safe as possible. GPS tracking, driver panic buttons tied directly to local emergency services and internal and external PA systems are fitted on every single bus as standard - all at zero cost to the school district. With BusRadio, drivers have a valuable tool to keep kids safe, seated, well-behaved and occupied in a positive way.

An independent study, conducted by Edison Media Research, found that overall behavior improved dramatically with the implementation of BusRadio programming: kids remained in their seats; willingness to follow rules increased; overall noise levels were reduced; and driver distractions were minimized. Please find the full report attached.



BusRadio builds on this commitment to offer the safest bus ride possible for kids by developing radio programming that far exceeds any other editing standard used in radio. BusRadio does not play standard FM radio versions of many popular songs, and eliminates all inappropriate lyrics and subject matter from broadcasts. Furthermore, because each community is unique, BusRadio often customizes programming content, including music and safety messages, to best serve each district.

Without BusRadio, drivers wouldn't have the option of playing suitable programming for kids, leaving the majority of drivers free to set their regular FM radio to any frequency they choose. Parents too wouldn't have the peace of mind that our better alternative to FM radio brings. We understand that parents have a right to know what their children are listening to and for this reason, we publish each day's show online for them to hear. There is no secrecy attached to our playlist, in fact - for your reference - please find attached a playlist of our most recent popular songs with BusRadio edits included.

In addition to hundreds of school districts in dozens of states, BusRadio partners with a select number of the nation's most trusted and highly-regarded non-profit organizations to bring positive public service messages to kids. An average of four minutes of every hour of programming is devoted solely to bus safety tips and public service announcements from our partners. Some of these include: SADD, City Year, President's Council on Physical Fitness and Sports, Take Pride in America, Stand Up for Kids, National Eating Disorder Association, Afterschool Alliance, Do Something, KaBoom! and the Ad Council.

Attached for your reference is a transcribed list of public service messages aired on BusRadio over the past six months on BusRadio.

BusRadio also broadcasts a small amount of age-appropriate paid sponsorships. These messages are vetted for suitability with the same care as all BusRadio programming. Each hour contains an average of four minutes of these age-appropriate sponsorships. Standard drive time FM radio averages more than three times this amount.

The saturation of commercial radio with alcohol advertisements and other inappropriate content is well documented. A recent study by the Center on Alcohol Marketing and Youth found more than one third of all alcohol advertising on commercial radio is likely to be heard by youth between the ages of 12 and 20, and researchers at the University of Pittsburgh School of Medicine found that one in three popular FM radio songs mention alcohol or drug use – most associated with partying, sex, violence or humor. BusRadio encourages commercial sponsors to deliver positive, socially responsible messages.

Please do not hesitate to contact me directly at (781) 453-0700 if I can be of further assistance. I would welcome the opportunity to meet with your office in person and address the contents of this letter and any questions your office may have as you prepare the study.

Sincerely yours,

Michael Kan

CEO

CC:

Raelynn Remy Media Bureau Room 4-A802

445 12th Street, S.W.

Washington, D.C. 20554



BusRadio Student Survey January 2009

Survey Results

Bus Safety

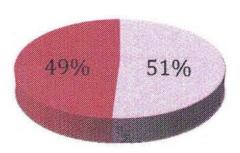
Eight in ten students recall hearing messages about bus safety on Bus Radio. Female students were slightly more likely than male students to recall the safety messages (83% vs. 78%). When asked if the safety messages heard over Bus Radio help them stay safe, 86% of students say that they do. More than half (57%) say that kids behave better when Bus Radio is on.

Respondent Profile

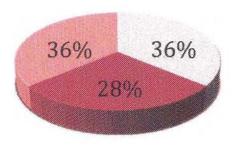
Gender was nearly evenly split among boys (51%) and girls (49%). Age groups were distributed as the following: 28% age 4-7, 36% age 8-9, and 36% age 10-12.

Who was interviewed



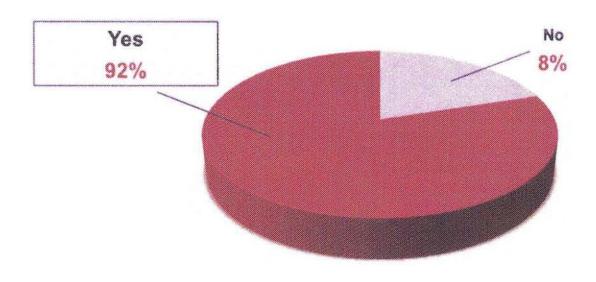


Ages Interviewed

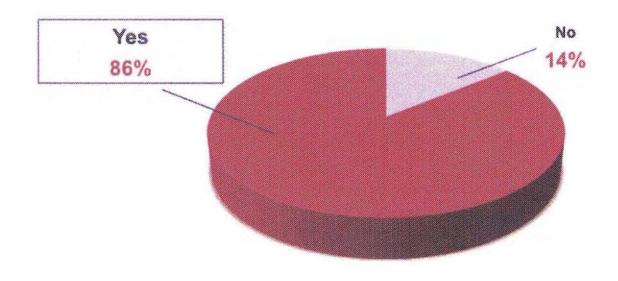




Did you hear any messages about bus safety on BusRadio?



Have the safety messages helped you stay safe on your bus?





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Bus Radio Bus Driver Survey May/June 2005 Edison Media Research

Research Summary

The objectives of this survey research were to present the Bus Radio pilot program to a select group of bus drivers and gather their opinions on the program before it was implemented and also gather their opinions after the program was in operation. Bus drivers of the Atlantic Express bus company in the Woburn, Arlington, and Wakefield, Massachusetts school districts were asked questions regarding children's behavior on the bus and about the atmosphere of their bus. In addition, bus drivers were asked their opinions of the Bus Radio concept. Ten bus drivers participated in the Bus Radio pilot program. All ten were interviewed before the Bus Radio pilot began. The one-page questionnaire was self-administered; it contained eight questions, two that were open-ended. The questionnaire is included in the Appendix to this report. The same ten bus drivers were interviewed after the Bus Radio pilot program had been active. Once again another one-page questionnaire was self-administered; it contained nine questions, one of which was open-ended. Bus Radio staff arranged for the surveys to be administered and they distributed the pre-pilot questionnaires to the bus drivers on May 6, 2005 and distributed the post-pilot questionnaires to the bus drivers June 16- 24, 2005.

Survey Results

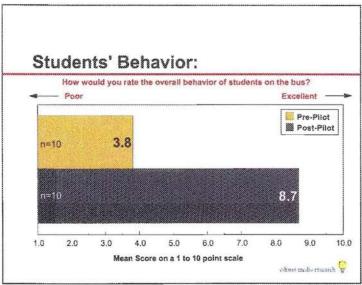
Bus Drivers were asked to rate the following items on a 10-point scale:

- Student's behavior on the bus
- Noise level
- Frequency of students remaining in their seats
- Willingness to follow bus rules

In addition, bus drivers were asked their opinions of the Bus Radio concept as well as questions regarding the music and radio-related habits on their bus.

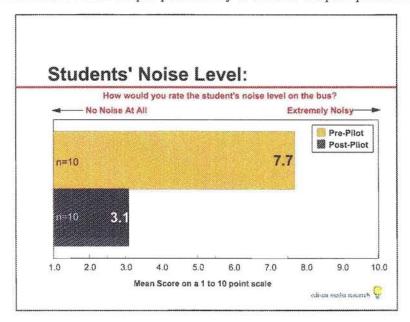
Bus drivers' perceptions of student behavior increased dramatically after the Bus Radio pilot program was implemented.

The bus drivers used a 1 to 10 rating scale where "1" means students' behavior is "poor" and a "10" means students' behavior is "excellent." The average rating of student behavior among the 10 bus drivers was 3.8, prior to the start of Bus Radio programming. After Bus Radio programming had been active for four weeks, bus drivers were asked again about student behavior and the average rating was 8.7.



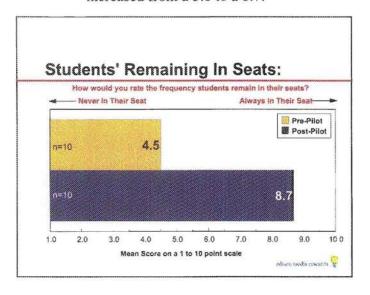
Bus drivers' perceptions of students' noise level decreased considerably after the Bus Radio pilot program was implemented.

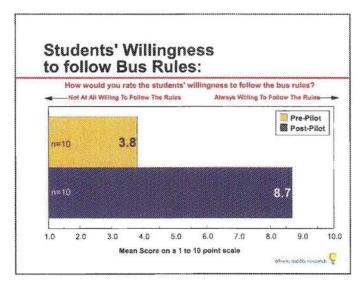
The bus drivers used a 1 to 10 rating scale where "1" means there is "no noise at all" and a "10" means it is "extremely noisy." The average rating of students' noise level among the 10 bus drivers went from 7.7 in the pre-pilot survey to a 3.1 in the post-pilot survey.



Both the perception of students following bus rules and students remaining in their seats while riding the bus showed impressive increases.

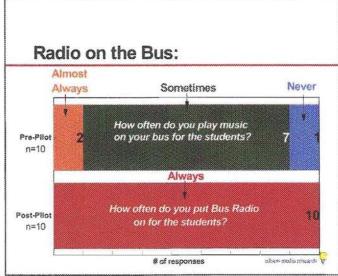
The survey results show that bus drivers felt that students' were more likely to remain in their seats and follow bus rules after having the Bus Radio program on their buses. The bus drivers used a 1 to 10 rating scale where "1" means the students are "never in their seat" and a "10" means the students are "always in their seat." The average rating of students' in their seat among the 10 bus drivers went from 4.5 to 8.7 after implementing Bus Radio. The bus drivers used a 1 to 10 scale where a "1" means the students are "not at all willing to follow bus rules" and a "10" means the students are "always willing to follow bus rules," and the mean rating increased from a 3.8 to a 8.7.

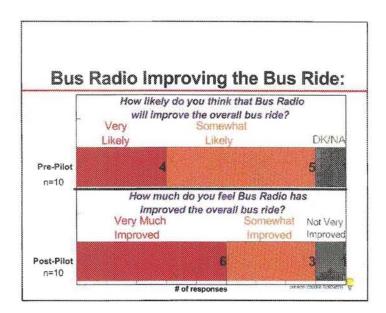




Before there was Bus Radio programming, some bus drivers may have played regular radio for the students on the bus.

For the pre-pilot survey, when asked, "How often do you play music on your bus for the students?" 7 bus drivers said they "sometimes" play music, 2 said they "almost always" play music and 1 said that they "never" play music. For the post-pilot survey, bus drivers were then asked, "How often do you put Bus Radio on for the students?" All of them said they "always" put Bus Radio on for the students. The goal beyond the pilot test is for bus drivers to continue to always put Bus Radio on for the students, thus offering an alternative to their previous options of playing regular radio or no radio at all.





Perceptions of Bus Radio improving the bus ride are as follows:

The pre-pilot questionnaire asked, "How likely do you think that Bus Radio will improve the overall bus ride?" 4 said "very likely" and 5 said "somewhat likely." The post-pilot questionnaire asked, "How much do you feel Bus Radio has improved the overall bus ride?" 6 said "very much improved" while only 3 said "somewhat improved" and 1 said "not very improved."

Other Findings

Based on the comments the bus drivers have heard from the students on their buses, 9 said the reaction to Bus Radio has been positive and only 1 said the reactions have been neither positive nor negative. None of the bus drivers have heard negative reactions to Bus Radio from their students.

Finally, when asked on the post-pilot questionnaire, "Do you think it is a good idea to continue Bus Radio?" all of the bus drivers said "yes" it is a good idea to continue Bus Radio.



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Bus Radio Questionnaire- Part One
The purpose of this survey is to provide Bus Radio with information so that their service can best
serve the needs of the bus drivers and students, individual responses will be kept completely
confidential. Thank you for your cooperation

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H. Pleas	e give us ;	your comr	nents and	feedback	regarding t	ne Bus	Radio conce	ept.		



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means NOT Not At Ali to Follow 1 E. How ofter Never 1	AT ALL will Willing the Rules 2 n do you pe Almost Never 2	3 ut Bus Radio o Sometimes	4 on for the Almos	5 studen	0 means 6 ts? <u>Uways</u> 5	7 F. Based of the student Bus Radio Positive 1	8 In the common son your bubbeen positive Negative	9 ents yous, has e or ne	es. Always Willing t Follow the Ruler 10 bu have heard fro the reaction to gative? Neither itive or Negative
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Means NOT Not At All to Follow 1 E. How ofter Never 1 G. How muc overall bus in	AT ALL will Willing the Rules 2 n do you po Almost Never 2 h do you fo cide? Not Ver	3 Sometimes 3 seel Bus Radio	4 on for the Almos Alway 4 has important	5 studentst <u>A</u>	0 means 6 ts? tways 5	7 F. Based of the student Bus Radio Positive 1 H. Do you t	8 In the comme s on your bubeen positive Negative 2 hink it is a gus Radio?	9 ents yous, has e or ne	es. Always Willing t Follow the Ruler 10 bu have heard fro the reaction to gative? Neither itive or Negative



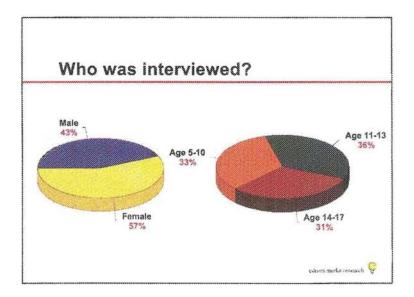
Bus Radio Student Survey June 2005 Edison Media Research

Research Summary

The objectives of this survey research were to gather the opinions of students that have been exposed to the Bus Radio pilot programming. Ten buses from the Atlantic Express bus company in the Woburn, Arlington, and Wakefield, Massachusetts school districts participated in the Bus Radio pilot program. Students were asked their opinions of Bus Radio music programming and features as well as several awareness and recall questions for specific advertisers. The questionnaire is included in the Appendix to this report. Bus Radio staff arranged for the surveys to be administered and they distributed the self-administered, one page questionnaires to the middle and high school students on the bus on June 16, 2005. Elementary school students brought the survey and a permission slip home to their parents to be brought back by June 20, 2005.

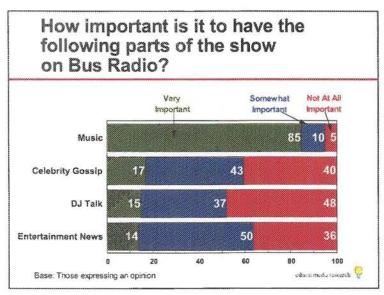
Survey Results

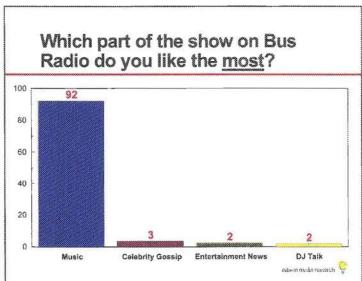
365 students completed the questionnaire, sample demographics are as follows:



Music ranks the highest as the part of the Bus Radio show that students like the most as well as find to be the most important part of the show.

When asked, "Which part of the show on Bus Radio do you like the most?" an overwhelming 92% said music is the part that they like the most. When asked, "How important is it to have the following parts of the show on Bus Radio?" 85% of those expressing an opinion say that music is the most important. In addition, 98% like to have music on their rides to and from school rather than no music.

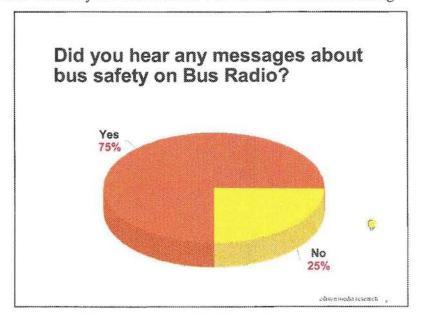




A large majority of students recall the bus safety messages that air on Bus Radio.

One of Bus Radio's goals is to promote bus safety to student riders. 75% of students recall hearing

messages about bus safety on Bus Radio. Bus Radio may be a good medium for other type of public service announcements geared toward children.





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Bus Radio Questionnaire -- Your answers are confidential

A. What is your a		t age in	years)	hearing on Bus Radio? Please write down the companies, services, or products you remember hearing about on Bus Radio.						
Male Female										
C. When do you circles next to all					he	J. Have you heard co				
You listen duri	ing the morni	ng ride	to school		Yes No					
You listen duri	ing the ride h	ome aft	er school	7th Heaven						
You listen duri	You listen during the ride to and from after school activi					Gilmore Girls				
Other				(write in)		Malcolm in the Mid	dle			
	12.					Everwood				
D. How much do the show on Bus	you like or o	iislike t	the following	ng parts of		Smallville				
				25/2		Lizzy McGuire				
		isilke		Like	Like	Reba				
	A Lot S	iome 2	So So	Some 4	A Lot	One Tree Hill				
Music	CONTRACTOR	B tal	Sent ton	S17331		K. Have you heard c	ommercials for	any of the		
Entertainment News	NO.					following television of	hannels/netwo	rks on		
Celebrity Gossip						Bus Radio?	Yes No			
DJ Talk						ABC				
						CBS				
E. Which part of	the show on	Bus R	adio do yo	u like the n	nost?	Disney				
Fill in the circle nanswer.	next to the <u>o</u>	<u>ne</u> choi	ce that <u>bes</u>	at fits your		WB				
Music						L. Have you heard of following movies on	ommercials for Bus Radio?	any of the		
Entertainment N	vews						Yes	No		
Celebrity Gossi	p					Sisterhood of the Trav	eling Pants			
DJ Talk						Madagascar				
F. How important on Bus Radio?	t is it to have	e the fo	llowing pa	rts of the s	how	Ice Princess				
on buo numo:	Not At Al	S	omewhat	Very	,	M. Have you heard o	ommercials for	any of		
	Important	t ir	nportant	Import	ant	the following wireles Bus Radio?	s phone service	s on		
	1		2	3	Carlo (more til	bus Radio?	Yes	No		
Music						Nextel				
Entertainment News						Verizon Wireless				
Celebrity Gossip				Virgin Mobile						
DJ Talk										
G. Did you hear a messages about on Bus Radio?	any bus safety	mu	Would you usic or no n les to and f	music on ye	our	to take the	BusRadio.	y.		
Yes No	Yes No Music					The first 200 l				
163 140			No musi	c		to complete the				
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Conclusions

- Bus drivers noticed a dramatic improvement in student behavior.
- Nine out of ten bus drivers reported a positive response from students.
- The feedback from bus drivers indicates that the Bus Radio program can be used as an incentive to reward good behavior.
- Bus drivers feel that Bus Radio has improved the overall bus ride.
- The comments from the bus drivers support a continuation of the Bus Radio program.

Conclusions

- Students like Bus Radio for the music and want to continue to hear it. Celebrity gossip, DJ talk and entertainment news are ranked less important than the music that is played.
- Safety messages are getting through to riders. Three-quarters said they have heard messages about bus safety on Bus Radio.

BUSRADIO PLAYLISTS

Most Played Elementary Songs-Spring 2009

Song Title Artist
Disturbia Rihanna

Tell Me Something I Don't Know Selena Gomez Get Back Demi Lovato

I Want It All Ashley Tisdale and Lucas Grabeel

Love Story(Pop Mix)

La La Land

The Climb

Tonight

Taylor Swift

Demi Lovato

Miley Cyrus

Jonas Brothers

How Do You Sleep Jesse McCartney (BusRadio Edit)

Hoedown Throwdown Miley Cyrus
Don't Forget Demi Lovato
ShakeDown Bryant James
It's Aright It's Ok Ashley Tisdale

Halo Beyonce (BusRadio Edit)

You Belong With Me Taylor Swift
Goodbye Kristina DeBarge
Paranoid Jonas Brothers

That's Not My Name(BR Edit) The Ting Tings (BusRadio Edit)

Battlefield Jordin Sparks
Fly On the Wall Miley Cyrus

Pocketful of Sunshine

Burnin' Up

Lovebug

Natasha Bedingfield

Jonas Brothers

Jonas Brothers

Most Played Middle School songs Spring 2009

Song Title Artist

Love Story(Pop Mix) Taylor Swift

Live Your Life T.I. (BusRadio Edit)
Halo Beyonce (BusRadio Edit)

Heartless Kanye West

How Do You Sleep Jesse McCartney (BusRadio Edit)

The Climb Miley Cyrus 1,2,3,4 Plain White Ts

Kiss Me Thru The Phone Soulja Boy (BusRadio Edit)

Second Chance Shinedown
ShakeDown Bryant James

Boom Boom PowBlack Eyed Peas(BusRadio Edit)Day N' NiteKId Cudi(BusRadio Edit)Turn My Swag OnSoulja Boy(BusRadio Edit)

It's Aright It's OkAshley TisdaleYou Belong With MeTaylor SwiftGoodbyeKristina DeBarge

Who's Got Your Money Tina Parol

That's Not My Name The Ting Tings (BusRadio Edit)

Paranoid Jonas Brothers

When The Wind Blows The All-American Rejects

Hoedown Throwdown Miley Cyrus
Battlefield Jordin Sparks

Most Played High School Songs-Spring 2009

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Song Titles	<u>Artist</u>	
Live Your Life	T.I. featuring Rihanna	(BusRadio Edit)
Second Chance	Shinedown	
Use Somebody	Kings Of Leon	
Halo	Beyonce	(BusRadio Edit)
Kiss Me Thru The Phone	Soulja Boy	(BusRadio Edit)
How Do You Sleep	Jesse McCartney	(BusRadio Edit)
Just Dance(BR EDIT)	Lady Gaga	(BusRadio Edit)
Day N' Nite	Kld Cudi	(BusRadio Edit)
Dead And Gone	T.I. with Justin Timberlake	(BusRadio Edit)
Welcome To The World	Kevin Rudolph with Kid Cudi	(BusRadio Edit)
Please Don't Leave Me	Pink	(BusRadio Edit)
Boom Boom Pow	Black Eyed Peas	(BusRadio Edit)
That's Not Mγ Name(BR Edit)	The Ting Tings	(BusRadio Edit)
ShakeDown	Bryant James	
Goodbye	Kristina DeBarge	
Knock You Down	Keri Hilson	(BusRadio Edit)
When The Wind Blows	The All-American Rejects	
l Do Not Hook Up	Kelly Clarkson	(BusRadio Edit)
Battlefield	Jordin Sparks	
I Gotta Feeling	Black Eyed Peas	(BusRadio Edit)
1,2,3,4	The Plain White Ts	
It'a Alright, It's OK	Ashley Tisdale	

1,2,3,4-Plain White Ts

1-2-1-2-3-4

Give me more loving than I've ever had Make me feel better when I'm feeling sad Tell me I'm special even though I know I'm not Make me feel good when I hurt so bad Barely getting mad I'm so glad I found you I love being around you You make it easy Its as easy as 1-2-1-2-3-4 There's only one thing To Do Three words For you (I love you) I love you There's only one way to say Those three words That's what I'll do (I love you) I love you Give me more loving from the very start Piece me back together when I fall apart Tell me things you never even tell your closest friends Make me feel good when I hurt so bad You're the best that I've had And I'm so glad I found you I love being around you You make it easy

There's only one thing
To Do
Three words
For you
(I love you) I love you
There's only one way to say
Those three words
That's what I'll do
(I love you) I love you
(I love you) I love you
You make it easy
It's easy as 1 2 1 2 3 4
There's only one thing
To Do
Three words

It's easy as 1-2-1-2-3-4

For you
(I love you) I love you
There's only one way to say
Those three words
That's what I'll do
(I love you) I love you
(I love you) I love you
1-2-3-4
I love you
(I love you) I love you

Battlefield – Jordin Sparks

Don't try to explain your mind I know what's happening here One minute, it's love And, suddenly, it's like a battlefield

One word turns into a
Why is it the smallest things that tear us down
My world's nothing when you're gone
I'm out here without a shield - can't go back, now

Both hands tied behind my back for nothing, oh, no These times when we climb so fast to fall, again Why we gotta fall for it, now...

Chorus:

I never meant to start a war You know, I never wanna hurt you Don't even know we're fighting for Why does love always feel like a battlefield, a battlefield Why does love always feel like a battlefield, a battlefield Why does love always feel like

Can't swallow our pride Neither of us wanna raise that flag, mmm If we can't surrender Then, we're both gonna lose we have, oh, no

Both hands tied behind my back for nothing (nothing), oh, no These times when we climb so fast to fall, again I don't wanna fall for it, now...

Chorus:

I never meant to start a war
You know, I never wanna hurt you
Don't even know we're fighting for
Why does love always feel like a battlefield, a battlefield, a battlefield
Why does love always feel like a battlefield, a battlefield, a battlefield
Better go and get your armor (get your armor), get your armor)
I guess you better go and get your armor (get your armor), get your armor)
I guess you better go and get your

We could pretend that we are friends, tonight (oh) And, in the morning, we wake up, and we'd be alright 'Cause, baby, we don't have to fight And I don't want this love to feel like a battlefield, a battlefield, a battlefield Why does love always feel like a battlefield, a battlefield I guess you better go and get your armor...

Chorus:

I never meant to start a war You know, I never wanna hurt you Don't even know we're fighting for

Why does love always feel like a battlefield, a battlefield Why does love always feel like a battlefield, a battlefield, a battlefield

I guess you better go and get your armor (get your armor), get your armor (get your armor)

I guess you better go and get your armor (get your armor), get your armor (get your armor)

Why does love always feel like (oh, oh)

Why does love always feel like a battlefield, a battlefield

I never meant to start a war Don't even know what we're fighting for I never meant to start a war Don't even know what we're fighting for...

Boom Boom Pow- Black Eyed Peas (BR Edit)

Gotta get that [x3]Gotta get that that that, that that Boom boom boom (Gotta get that) [x4] Boom boom (Yeah) [x2] Boom boom boom [x2][Will.i.am] I got the hit that beat the block You can get that bass overload I got the that rock and roll That future flow That digital spit Next level visuallll I got that (Boom boom boom) How the beat bang (Boom boom boom) [Fergie] I like that boom boom pow Them chicken jackin my style They try copy my swagger Im on that next now Im so 3008 You so 2000 and late I got that boom boom boom That future boom boom Let me get it now Boom boom boom (Gotta get that) [x4] Boom boom boom (Yeah) [x2]Boom boom boom [x2] [Taboo] Im on the supersonic boom Yall hear the space shit zoom When I step inside the room them girls go, uh Y'all stuck on super They're no fast stupid a bit Im on that HD flat This beat go boom boom pow [Apl.de.ap] Im a beast when you turn me on Into the future cybertron Harder, faster, better, stronger Extra ladies extra longer, cuz We got the beat that bounce We got the beat that pow We got the beat that 808 That the boom boom in your town